

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOBITV, INC., *et al.*,Debtors.¹

Chapter 11

Case No. 21-10457 (LSS)

Jointly Administered

Obj. Deadline: November 4, 2021 @ 4:00 p.m. (ET)
Hearing Date: December 1, 2021 @ 10:00 a.m. (ET)

**SUMMARY OF FINAL APPLICATION FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP,
AS COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION,
FOR THE PERIOD FROM
MARCH 1, 2021 THROUGH AND INCLUDING SEPTEMBER 23, 2021**

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	Debtors and Debtors in Possession
Date of Retention:	<i>Nunc Pro Tunc</i> to March 1, 2021 by order signed March 26, 2021
Period for which Compensation and Reimbursement is Sought:	March 1, 2021 through September 23, 2021
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$1,289,983.50 ²
Amount of Reimbursable Expenses Sought as Actual, Reasonable and Necessary:	\$47,542.11 ³
This is a Final Application.	

The total time expended for fee application preparation for Debtors' professionals is approximately 10 hours and the corresponding compensation requested is approximately \$10,000.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's U.S. tax identification number are as follows: MobiTV, Inc. (2422) and MobiTV Service Corporation (8357). The Debtors' mailing address is 350 S. Grand Avenue, Suite 3000, Los Angeles, CA 90071.

² This amount does not include the \$10,000 incurred in preparing the Debtors' professionals' fee application after the Effective Date of the Debtors' Plan.

³ Expenses for this Final Fee Application presently total \$44,542.11. Applicant hereby requests approval of up to \$3,000.00 for additional expenses that may not have yet been entered into the Firm's timekeeping system.

If this is not the first application filed, disclose the following for each prior application:

DATE FILED	PERIOD COVERED	REQUESTED		APPROVED		PAID	
		FEES	EXPENSES	FEES	EXPENSES	FEES	EXPENSES
7/15/21	3/1/21 – 5/31/21	\$850,599.50	\$31,502.57	\$850,599.50	\$31,502.57	\$850,599.50	\$31,502.57
7/29/21	6/1/21 – 6/30/21	\$192,818.00	\$5,976.82	\$154,254.40	\$5,976.82	\$154,254.40	\$5,976.82
8/25/21	7/1/21 – 7/31/21	\$84,792.00	\$3,945.98	\$67,833.60	\$3,945.98	\$67,833.60	\$3,945.98
9/21/21	8/1/21 – 8/31/21	\$76,401.50	\$3,116.74	<i>Objection deadline has not yet passed</i>	<i>Objection deadline has not yet passed</i>		
10/6/21	9/1/21 – 9/23/21	\$85,372.50	\$0.00	<i>Objection deadline has not yet passed</i>	<i>Objection deadline has not yet passed</i>		

COMPENSATION BY PROFESSIONALSMobiTV, Inc., *et al.*

21-10457 (LSS)

March 1, 2021 through September 23, 2021

Name of Applicant	Position of the Applicant	Hourly Billing Rate	Total Hours	Total Compensation
David J. Barton	Partner	\$1,345	0.40	\$538.00
Debra Grassgreen	Partner	\$1,295	23.10	\$29,914.50
Henry C. Kevane	Partner	\$1,275	12.10	\$15,427.50
Richard J. Gruber	Of Counsel	\$1,275	4.90	\$6,247.50
Andrew W. Caine	Partner	\$1,245	7.30	\$9,088.50
Kenneth H. Brown	Partner	\$1,225	0.30	\$367.50
Iain A.W. Nasatir	Partner	\$1,145	9.90	\$11,335.50
Maxim B. Litvak	Partner	\$1,125	50.40	\$56,700.00
Mary F. Caloway	Of Counsel	\$1,095	361.30	\$395,623.50
Joshua M. Fried	Partner	\$1,050	3.00	\$3,150.00
Victoria A. Newmark	Of Counsel	\$1,050	5.70	\$5,985.00
Jeffrey W. Dulberg	Partner	\$1,025	0.20	\$205.00
Gina F. Brandt	Of Counsel	\$950	3.40	\$3,230.00
Colin R. Robinson	Of Counsel	\$925	6.10	\$5,642.50
Nina L. Hong	Partner	\$875	3.70	\$3,237.50
Jason H. Rosell	Partner	\$845	451.60	\$381,602.00
Cia H. Mackle	Of Counsel	\$750	6.00	\$4,500.00
Benjamin L. Wallen	Associate	\$750	217.30	\$162,975.00
Brittany M. Michael	Of Counsel	\$695	3.80	\$2,641.00
Leslie A. Forrester	Law Librarian	\$475	3.30	\$1,567.50
Beth D. Dassa	Paralegal	\$460	154.80	\$71,208.00
Elizabeth C. Thomas	Paralegal	\$460	2.30	\$1,058.00
Patricia E. Cuniff	Paralegal	\$460	161.10	\$74,106.00
Karina K. Yee	Paralegal	\$460	7.50	\$3,450.00
Mike A. Matteo	Paralegal	\$425	3.60	\$1,530.00
Cheryl A. Knotts	Legal Assistant	\$425	2.50	\$1,062.50
Denise L. Mendoza	Legal Assistant	\$395	18.30	\$7,228.50
Beatrice M. Koveleski	Legal Assistant	\$375	14.30	\$5,362.50
Charles J. Bouzoukis	Legal Assistant	\$375	11.50	\$4,312.50
Charles J. Bouzoukis	Legal Assistant	\$350	48.50	\$16,975.00
Sheryle L. Pitman	Legal Assistant	\$375	1.00	\$375.00
Karen S. Neil	Legal Assistant	\$375	7.90	\$2,962.50
Andre R. Paul	Legal Assistant	\$375	1.00	\$375.00
Total			1,608.10	\$1,289,983.50
Blended Rate			\$802.18	

COMPENSATION BY PROJECT CATEGORY

MobiTV, Inc., *et al.*
 21-10457 (LSS)
 March 1, 2021 through September 23, 2021

Project Category	Total Hours	Total Fees
Asset Analysis	4.30	\$3,188.50
Asset Disposition	292.30	\$271,195.50
Bankruptcy Litigation	141.40	\$106,205.50
Business Operations	5.60	\$5,878.00
Case Administration	245.30	\$149,320.00
Claims Administration/Objection	71.80	\$62,845.50
Compensation of Professionals	83.70	\$52,498.00
Corporate Governance	15.10	\$12,793.50
Creditor Meetings & Communications	4.00	\$4,380.00
Employee Benefits/Pension	70.10	\$65,132.50
Executory Contracts	85.20	\$60,386.50
Financial Filings	39.20	\$33,683.50
Financing	39.40	\$40,650.50
First Day Motions	29.40	\$28,469.50
General Creditors ' Committee	24.00	\$23,501.00
Hearing	60.30	\$43,870.50
Insurance Issues	21.90	\$22,039.50
Meeting of Creditors	2.40	\$2,403.00
Plan & Disclosure Statement	288.20	\$230,730.00
Stay Litigation	0.30	\$215.00
PSZJ Retention	4.60	\$4,460.00
Retention of Professionals/Others	79.50	\$66,028.00
Tax Issues	0.10	\$109.50
TOTAL	1,608.10	\$1,289,983.50

EXPENSE SUMMARY

MobiTV, Inc., *et al.*
 21-10457 (LSS)
 March 1, 2021 through September 23, 2021

Expense Category	Service Provider (if applicable)	Total Expenses
Attorney Service		\$1,175.00
Bloomberg		\$207.10
Business Meals		\$1,055.99
Conference Call		\$3.93
Delivery/Courier Service		\$398.05
Filing Fee		\$3,852.00
Legal Research	Lexis/Nexis	\$371.38
Legal Research	Pacer	\$1,543.00
Outside Services		\$1,370.97
Overnight Mail	Federal Express	\$11,753.94
Postage		\$6,375.80
Reproduction Expense		\$6,602.80
Reproduction/Scan Copy		\$4,982.10
Research		\$726.00
Transcript		\$4,124.05
Additional Anticipated Expenses not to exceed \$3,000.00		\$3,000.00
TOTAL		\$47,542.11

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**FINAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF
EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP, AS COUNSEL FOR THE
DEBTORS AND DEBTORS IN POSSESSION,
FOR THE PERIOD FROM
MARCH 1, 2021 THROUGH AND INCLUDING SEPTEMBER 23, 2021**

Pachulski Stang Ziehl & Jones LLP (“**PSZJ**”), bankruptcy counsel to MobiTV, Inc. and MobiTV Service Corporation (the “**Debtors**”), the debtors and debtors-in-possession in the above-captioned jointly administered Chapter 11 case (the “**Chapter 11 Case**”), submits this application (the “**Application**”) for final allowance of compensation for professional services rendered by PSZJ to the Debtors for the period March 1, 2021 through September 23, 2021 (the “**Application Period**”) and reimbursement of actual and necessary expenses incurred by PSZJ during the Application Period under sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed

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under 11 U.S.C. § 330, effective January 30, 1996 (the “**U.S. Trustee Guidelines**”), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Doc. No. 207] (the “**Interim Compensation Procedures Order**”).² In support of this Application, PSZJ represents as follows:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

2. On March 1, 2021 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under the Bankruptcy Code in this Court commencing the Chapter 11 Case. The Debtors have continued in possession of their property and have continued to operate and manage their business debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

3. On March 15, 2021, the Office of the United States Trustee (the “**UST**”) appointed an official committee of unsecured creditors (the “**Committee**”). No request has been made for the appointment of a trustee or examiner.

4. On September 23, 2021, the Court entered the *Order (I) Granting Final Approval of Disclosure Statement and (II) Confirming Chapter 11 Plan of Liquidation* [Docket No. 505].

PSZJ’S RETENTION

² Terms used but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Procedures Order.

5. The retention of PSZJ, as counsel for the Debtors, was approved effective as of March 1, 2021 by this Court's *Order Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 Authorizing the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date*, signed on or about March 26, 2021 (the "**Retention Order**"). The Retention Order authorized PSZJ to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

FEE PROCEDURES ORDER

6. On or about April 26, 2021, the Court signed the Interim Compensation Procedures Order, authorizing certain professionals ("**Professionals**") to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Interim Compensation Procedures Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within twenty (20) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending on June 1, 2021, and at three-month intervals thereafter, each of the Professionals shall file and serve an interim fee application for compensation and reimbursement of expenses sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

RELIEF REQUESTED

7. PSZJ submits this Application (a) for final allowance of reasonable compensation for the actual, reasonable and necessary professional services that it has rendered as bankruptcy

counsel for the Debtors in these Chapter 11 Cases for the period from March 1, 2021 through September 23, 2021, and (b) for reimbursement of actual, reasonable and necessary expenses incurred in representing the Debtors during that same Application Period.

8. During the period covered by this Application, PSZJ incurred fees in the amount of \$1,289,983.50. For the same period, PSZJ incurred actual, reasonable and necessary expenses totaling \$44,542.11. With respect to these amounts, as of the date of this Application, PSZJ has received payments for fees in the total amount of \$1,072,687.50 and payment for expenses in the amount of \$41,425.37.

9. By this Application, PSZJ seeks payment of the remaining \$223,412.74 in incurred, but unpaid fees and expenses, which corresponds to (i) the 20% holdback of fees in the amount of \$38,563.60 owed on account of PSZJ's Fourth Monthly Fee Application; (ii) the 20% holdback of fees in the amount of \$16,958.40 owed on account of PSZJ's Fifth Monthly Fee Application; (iii) fees totaling \$76,401.50 and expenses totaling \$3,116.74 owed on account of PSZJ's Sixth Monthly Fee Application; (iv) \$85,372.50 in fees incurred for the period September 1, 2021 through September 23, 2022; and (v) a request for approval of up to \$3,000.00 in additional expenses that may not have yet been entered into the Firm's timekeeping system. PSZJ's fees for the Application Period are based on the customary compensation charged by comparably skilled professionals in cases other than cases under Title 11.

10. PSZJ also seeks approval and payment of \$10,000 in fees incurred during the preparation and finalization of the Debtors' professionals final fee applications which do not appear in the invoices attached as **Exhibit A**.

11. Set forth on the foregoing “Compensation by Project Category” is a summary by subject matter categories of the time expended by timekeepers billing time to thee Chapter 11 Cases.

12. **Exhibit A** attached hereto contains logs, sorted by case project category, which show the time recorded by professionals and descriptions of the services provided.

13. PSZJ has endeavored to represent the Debtors in the most expeditious and economical manner possible. Tasks have been assigned to attorneys, paralegals, and other support staff at PSZJ so that work has been performed by those most familiar with the particular matter or task and, where attorney or paralegal involvement was required, by the lowest hourly rate professional appropriate for a particular matter. Moreover, PSZJ has endeavored to coordinate with the other professionals involved in this case so as to minimize any duplication of effort and to minimize attorneys’ fees and expenses to the Debtors. We believe we have been successful in this regard.

14. No agreement or understanding exists between PSZJ and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these Chapter 11 Cases.

15. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies to the best of her information, knowledge and belief that this Application complies with that Rule.

16. WHEREFORE, PSZJ respectfully requests that this Court: (a) allow PSZJ (i) final compensation in the amount of \$1,289,983.50 for actual, reasonable and necessary professional services rendered on behalf of the Debtors during the period March 1, 2021 through September 23, 2021, plus approval and payment of \$10,000 in fees incurred preparing and filing the Debtors’ professionals’ final fee applications and (ii) final reimbursement in the amount of \$44,542.11 for

actual, reasonable and necessary expenses, plus approval of up to \$3,000.00 for additional expenses that may not have yet been entered into the Firm's timekeeping system, for a total final allowed amount of \$1,347,525.61; (b) authorize and direct the Debtors, at this time, to pay to PSZJ any portion of the total final allowed amount of \$1,347,525.61 that the Debtors have not otherwise already paid to PSZJ; and (c) grant such other and further relief as is just and proper.

Dated: October 8, 2021
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Debra I. Grassgreen (admitted *pro hac vice*)

Jason H. Rosell (admitted *pro hac vice*)

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